



SUBJECT: Anti-Harassment Policy

EFFECTIVE DATE: 8/3/2015

POLICY NUMBER:

REVISION DATE: 8/3/2015

RESPONSIBLE PARTY: Legal Department

Policy: The Scott Fetzer Company and its affiliates ("Scott Fetzer") are committed to providing a work environment that is free of illicit harassment. As a result, Scott Fetzer maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on gender, race, color, ethnicity, national origin, citizenship status, religion, age, marital status, sexual orientation, gender identity, veteran or military status, political affiliation, disability, pregnancy, genetic information or any other characteristic protected by federal, state or local law. All such harassment is prohibited.

Scott Fetzer's anti-harassment policy applies to all persons involved in our operations and prohibits harassing conduct by any employee of Scott Fetzer, including nonsupervisory employees, supervisors and managers. This policy also protects employees from prohibited harassment by third parties, such as vendors, clients, or temporary or seasonal workers.

Procedure:

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment also includes various forms of offensive behavior based on sex. The following is a partial list:

- Unwanted sexual advances.

- Offering employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails or text messages.
- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature, graphic verbal commentary about an individual's body, sexually degrading words to describe an individual, suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for making reports or threatening to report sexual harassment.

Other Types of Harassment

Prohibited harassment on the basis of gender, race, color, ethnicity, national origin, citizenship status, religion, age, marital status, sexual orientation, gender identity, veteran or military status, political affiliation, disability, pregnancy, genetic information or any other characteristic protected by federal, state or local law, includes behavior similar to the illustrations above pertaining to sexual harassment. They include conduct such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's protected classification;
- Visual conduct including derogatory posters, photography, cartoons, drawings or gestures based on protected classification; and
- Physical conduct including assault, unwanted touching or blocking normal movement because of an individual's protected status.

Reporting Procedure

Any employee who is aware of any violation of this policy should immediately make a written or verbal report to the local management team (following the chain of command where possible) or local Human Resources representatives to report such incidents. Employees who are not comfortable with that approach for any reason should contact Scott Fetzer's Local Ethics Leader or the General Counsel of Scott Fetzer. Retaliation for using this reporting procedure, or for filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency is strictly prohibited. Employees who are aware of any retaliation prohibited by this policy should immediately make a written or verbal report

to the local management team (following the chain of command where possible) or local Human Resources representatives to report such incidents. Employees who are not comfortable with that approach for any reason should contact Scott Fetzer's Local Ethics Leader or the General Counsel of Scott Fetzer.

After a report is received, it will be investigated as appropriate. Violations of this policy will not be tolerated, and appropriate disciplinary action, up to and including termination of employment, may be taken. Scott Fetzer expects that all employees fully cooperate with any investigation conducted by the Company into a complaint of an alleged violation of this policy.

X Kevin Johnson



9.20.17